## Kerry M. Richard

From:

Patrick Sorek [PSorek@LeechTishman.com]

Sent:

Thursday, December 01, 2005 6:22 PM

To:

Kerry M. Richard

Subject: RE: Deposition Schedules

## Kerry:

That sounds like a plan.

As I mentioned before, attached should be our reply on the motion to compel.

Thanks.

Pat S.

----Original Message----

From: Kerry M. Richard [mailto:kmrichard@tobinoconnor.com]

Sent: Thursday, December 01, 2005 6:17 PM

To: Patrick Sorek

Subject: Deposition Schedules

Hi Pat:

Thanks for your message. To confirm, I will plan to depose Lisa Brown on Thursday 12/15 starting around noon (I will firm up a time as soon as I book my flight), and continuing for up to 7 hours that day.

Dr. Albert and Dr. Pepicello will both be available on Friday December 16 for you to depose, and then if necessary, we can continue Lisa's deposition on Saturday 12/17.

I would like to catch up with you tomorrow so that we can try to plan out the remainder of the depositions necessary in this case. If we can hash this out before Tuesday, hopefully you and Ziad can present a joint motion for an extension of discovery to the court at the status conference?

Thanks again.

Kerry

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